

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 05-495-JJF
	)	
LAWNS UNLIMITED, LTD., AND	)	
EDWARD FLEMING,	)	
Defendant.	)	

**DEFENDANT'S FIRST REQUESTS FOR ADMISSIONS  
DIRECTED TO PLAINTIFF**

Pursuant to Federal Rule of Civil Procedure 36, Defendants, through the undersigned, requests that Plaintiff admit or deny under oath the following requests for admission within thirty days of service.

**INSTRUCTIONS**

1. Each and every definition set forth in Defendants' First Set of Interrogatories to Plaintiff are incorporated by reference as if fully set forth herein.
2. With respect to each numbered request for admission, admit or deny the matter under oath. In answering these requests, you are required to admit or deny the matter specifically or set forth in detail the reasons why you cannot admit or deny the matter truthfully.
3. If a request for admission is denied, Plaintiff shall qualify his answer and shall specify in reasonable detail why so much of it as is true and qualify or deny the remainder.
4. With respect to each request for admission to which an objection is raised:

- a. state the nature of the objection;
- b. state the basis for claiming the objection; and
- c. admit or deny any portion of the request for admission to which an objection is not raised.

5. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state that you have made reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny.

6. You must answer or object to a request within thirty (30) days of service or it will be deemed admitted for all purposes in this case.

7. This request for admissions is deemed continuing and, whenever you obtain additional information responsive to them but not supplied in answer to them, such information shall be supplied as though expressly requested by separate admission, as required by the Federal Rules of Civil Procedure.

#### **REQUESTS FOR ADMISSIONS**

1. Admit that you do not seek damages for harm that occurred before December 23, 2003 or after April 22, 2007.
2. Admit that, during your employment with Defendants, your job duties included administration of employee policies. (See Exhibit 1).

3. Admit that the health insurance plan offered by your current employer may, at the option of the employee, be extended to include coverage for the employee's spouse and children in addition to coverage for the employee.
4. Admit that you did not provide Defendants with the date on which you anticipated your maternity leave to begin.
5. Admit that, prior to January 1, 2004, you were aware that employers, under certain circumstances, are required to offer employees continued health care coverage following termination of their employment.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca

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Margaret M. DiBianca, Esquire (Bar I.D. 4539)  
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Attorneys for Defendant(s)

DATED: April 27, 2007

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,	)	
	)	
Plaintiff,	)	
v.	)	
	)	C.A. No. 04-970-JJF
LAWNS UNLIMITED, LTD., and	)	
EDWARD FLEMING,	)	
	)	
Defendants.	)	
	)	

**NOTICE OF SERVICE**

I, Margaret M. DiBianca, Esquire, hereby certify that on **April 27, 2007**, two (2) true and correct copies of **DEFENDANTS' REQUEST FOR ADMISSIONS DIRECTED TO PLAINTIFF** were caused to be served by depositing same in the United States Certified Mail, Return Receipt Requested and U.S. Mail, postage prepaid to the following non-registered participant:

Renee M. Butz  
58 Hickory Drive  
Northeast, MD 21901

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca, Esq.

William W. Bowser, Esquire (Bar I.D. 2239)  
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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2007 I electronically filed NOTICE OF **DEFENDANTS' REQUEST FOR ADMISSIONS DIRECTED TO PLAINTIFF** with the Clerk of Court using CM/ECF, and, on the same day, caused two (2) copies of such Notice to be deposited in the U.S. Certified Mail, Return Receipt Requested and U.S. Mail, postage prepaid to the following non-registered participant:

Renee M. Butz  
58 Hickory Drive  
Northeast, MD 21901

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca, Esq.

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DATED: April 27, 2007